

FILED  
JOHN P. HEHMAN  
CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

2014 OCT 16 AM 10:33

UNITED STATES OF AMERICA

vs.

BRYAN D. LEE

CASE NO.

JUDGE JUDGE WATSON

18 U.S.C. § 242

18 U.S.C. § 2261A(2)

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

2:14 cr 214

INFORMATION

**THE UNITED STATES ATTORNEY CHARGES:**

INTRODUCTORY ALLEGATIONS

1. The defendant, BRYAN D. LEE ("LEE"), was a Trooper with the Ohio State Highway Patrol ("OSP") from in or about January 2006 until in or about October 2013. Prior to his commission as a Trooper, LEE received extensive training regarding OSP policies and procedures. LEE also received similar, periodic training after his commission. As an OSP Trooper, LEE was authorized by Ohio laws to make arrests and conduct traffic stops and searches and seizures.

COUNT ONE

**Deprivation of Rights Under Color of Law  
(18 U.S.C. § 242)**

2. The introductory allegations set forth in paragraph 1 realleged and incorporated by reference as though fully set forth herein.

3. On or about November 19, 2010, in the Southern District of Ohio, Eastern Division, the defendant, BRYAN D. LEE, while acting under color of law, willfully subjected the woman "NS" to the deprivation of rights, privileges, and immunities secured and protected by the Constitution and laws of the United States, that is, the due process right to bodily integrity

protected by the Fourteenth Amendment to the United States Constitution and the right to be free from unreasonable searches and seizures protected by the Fourth Amendment of the United States Constitution, through abusive sexual contact of NS.

All in violation of Title 18, United States Code, § 242.

**COUNT TWO**  
**Deprivation of Rights Under Color of Law**  
**(18 U.S.C. § 242)**

4. The introductory allegations set forth in paragraph 1 are realleged and incorporated by reference as though fully set forth herein.

5. On or about November 21, 2010, in the Southern District of Ohio, Eastern Division, the defendant, BRYAN D. LEE, while acting under color of law, willfully subjected the woman “KD” to the deprivation of rights, privileges, and immunities secured and protected by the Constitution and laws of the United States, that is, the due process right to bodily integrity protected by the Fourteenth Amendment to the United States Constitution and the right to be free from unreasonable searches and seizures protected by the Fourth Amendment, through abusive sexual contact of KD.

All in violation of Title 18, United States Code, § 242.

**COUNT THREE**  
**Deprivation of Rights Under Color of Law**  
**(18 U.S.C. § 242)**

6. The introductory allegations set forth in paragraph 1 is realleged and incorporated by reference as though fully set forth herein.

7. On or about March 22, 2012, in the Southern District of Ohio, Eastern Division, the defendant, BRYAN D. LEE, while acting under color of law, willfully subjected the woman “JE”

to the deprivation of rights, privileges, and immunities secured and protected by the Constitution and laws of the United States, that is, the due process right to bodily integrity protected by the Fourteenth Amendment to the United States Constitution, through abusive sexual contact of JE.

All in violation of Title 18, United States Code, § 242.

**COUNT FOUR**  
**Deprivation of Rights Under Color of Law**  
**(18 U.S.C. § 242)**

8. The introductory allegations set forth in paragraph 1 are realleged and incorporated by reference as though fully set forth herein.

9. On or about September 8, 2013, in the Southern District of Ohio, Eastern Division, the defendant, BRYAN D. LEE, while acting under color of law, willfully subjected the woman “TF” to the deprivation of rights, privileges, and immunities secured and protected by the Constitution and laws of the United States, that is, the due process right to bodily integrity protected by the Fourteenth Amendment to the United States Constitution, through abusive sexual contact of TF.

All in violation of Title 18, United States Code, § 242.

**COUNT FIVE**  
**Cyberstalking**  
**(18 U.S.C. § 2261A(2))**


10. The introductory allegations set forth in paragraph 1 are realleged and incorporated by reference as though fully set forth herein.

11. Between on or about September 8, 2013 and on or about October 16, 2013, in the Southern District of Ohio, Eastern Division, and elsewhere, the defendant, BRYAN D. LEE, with the intent to injure, harass, intimidate, and place under surveillance with the intent to injure, harass,

and intimidate another person, "TF," used an interactive computer service, an electronic communication service, an electronic communication service of interstate commerce, and facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably expected to cause substantial emotional distress to TF.

All in violation of Title 18, United States Code, Section 2261A(2).

CARTER M. STEWART  
United States Attorney



GARY L. SPARTIS  
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